

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ELIZABETH FLINT,

Plaintiff,

-against-

ROCKAWAY BEACH LLC AND EMPIRE
MEDICAL OF ROCKAWAY BEACH P.C.,

Defendants.
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Docket No: 1:22-cv-04458-ENV-JRC

**AFFIRMATION OF
ROBERT G. HANSKI, ESQ.
IN SUPPORT OF
PLAINTIFF'S REQUEST FOR
CERTIFICATE OF DEFAULT**

Robert G. Hanski, Esq. an attorney duly admitted to practice in the Eastern District of New York, declares under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief:

1. I am member of Parker Hanski LLC and the attorney for plaintiff.
2. Pursuant to Local Rule 55.1 and Rule 55(a) of the Federal Rules of Civil Procedure, I make this affirmation in support of plaintiff's application for a Certificate of Default against Defendant Empire Medical of Rockaway Beach P.C. for failure to answer or otherwise respond to the Complaint, as the times for Defendant Empire Medical of Rockaway Beach P.C. to do so with respect to the Complaint has expired.
3. This action was commenced pursuant to a Complaint filed on July 28, 2022.
4. The Complaint was properly served and an executed Affidavit of Service was filed on ECF on November 21, 2022. (See ECF Document No. 9).
5. The time for Defendant Empire Medical of Rockaway Beach P.C. to answer or otherwise move with respect to the complaint herein has expired.
6. Defendant Empire Medical Of Rockaway Beach P.C. has failed to plead, answer, or otherwise defend against the Complaint.
7. Defendant Empire Medical of Rockaway Beach P.C. is not an infant or incompetent.

8. Defendant Empire Medical Of Rockaway Beach P.C. is not presently in the military service of the United States as appears from the facts in this litigation.

WHEREFORE, plaintiff respectfully requests that the default of Defendant Empire Medical Of Rockaway Beach P.C. be noted and a Certificate of Default issued against Defendant Empire Medical Of Rockaway Beach P.C. for failure to answer or otherwise respond to the Complaint.

Dated: New York, New York
November 22, 2022

PARKER HANSKI LLC

By: _____/s
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